

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-218-E

IN RE:)
 Alex Kadoshnikov,)
 Complainant/Petitioner)
) **DUKE ENERGY CAROLINAS,**
 v.) **LLC’S FIRST SET OF**
) **DISCOVERY TO**
 Duke Energy Carolinas, LLC,) **COMPLAINANT**
 Defendant/Respondent)
)

Duke Energy Carolinas, LLC (“DEC”), by and through its legal counsel, pursuant to Rule 103-833 of the Rules of Practice and Procedure of the South Carolina Public Service Commission, hereby serves Alex Kadoshnikov (“Complainant”) with the following First Set of Requests for Production and Interrogatories to be answered **on or before April 6, 2021**.

Please note that these Requests for Production and Interrogatories are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel should be provided to counsel for DEC through supplemental responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested information and documents, and organize and label them to correspond with the numbers in the Request. Documents attached to each other should not be separated.
2. Please provide responses to the following data requests electronically via email to Katie.Brown2@duke-energy.com and swellborn@robinsongray.com. To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 on or before April 6, 2021.

3. Please execute the Certification that follows these Requests.

Dated this 17th day of March, 2021.

s/Samuel J. Wellborn
Samuel J. Wellborn
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
Telephone: (803) 929-1400
swellborn@robinsongray.com

Attorney for Duke Energy Carolinas, LLC

INTERROGATORIES

1-1 Please provide a summary of your education and professional experience.

RESPONSE:

1-2 Please state your current occupation.

RESPONSE:

1-3 Did Duke Energy Carolinas relocate your meter to a structure or pole away from your residence? If so, on what date?

RESPONSE:

1-4 Who choose the location for the new meter structure, and who constructed the new meter structure?

RESPONSE:

1-5 How many feet away from your house is your meter now located?

RESPONSE:

1-6 Have you perceived or experienced any symptoms that you believe are attributable to the smart meter installed at your residence?

RESPONSE:

1-7 Have you consulted with a South Carolina-licensed physician concerning the matters discussed in your complaint or the symptoms described in response to Interrogatory 1-5, if any? If so, when did you consult with a physician and did you receive a diagnosis?

RESPONSE:

- 1-8 Are you the author of “Irradiated,” the attachment to your “testimony” filed in the docket on December 8, 2020. If not, was “Irradiated” prepared at your direction and under your supervision?

RESPONSE:

- 1-9 Please identify with specificity the portions, if any, of your December 8, 2020 “testimony” filing that were based upon your personal perceptions or observations?

RESPONSE:

REQUESTS FOR PRODUCTION

- 1-1 Please provide your curriculum vitae or résumé.

RESPONSE:

CERTIFICATION

I, **Aleksy Kadoshnikov**, state that the contents of these Responses to Interrogatories and Requests for Production are true, accurate and correct to the best of my knowledge, information and belief. I certify that the foregoing statement made by me is true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

(SIGNATURE)

(DATE)